

HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WAG ACQUISITION, LLC,

Plaintiff,

v.

FLYING CROCODILE, INC., d/b/a FCI, INC.,
et al.

Defendants.

Case No. 2:19-cv-01278-BJR

**CONSENTED MOTION TO EXTEND
DAMAGES DISCOVERY DEADLINE**

The parties stipulate as follows:

1. On July 2, 2021, the Court issued its Order on Pending Motions that, among other things, permitted the parties to “engage in discovery related to damages for a period of four months following the date of this order,” i.e., until November 2, 2021.

2. Immediately thereafter, the parties diligently began preparing damages discovery.

3. Following the exchange of discovery responses and the start of the production of damages documents, both of which were most recently supplemented by both parties on October 15, 2021, the parties immediately began scheduling depositions. On October 15, 2021, the parties

CONSENTED MOTION TO EXTEND DAMAGES
DISCOVERY DEADLINE– 1
(Case No. 2:19-cv-01278-BJR)

CORR CRONIN LLP
1001 Fourth Avenue, Suite 3900
Seattle, Washington 98154-1051
Tel (206) 625-8600
Fax (206) 625-0900

1 served their formal notices of depositions. Namely, Plaintiff noticed 30(b)(6) depositions of
2 Defendants, and Defendants noticed two individual depositions and a 30(b)(6) deposition of
3 Plaintiff.

4 4. In parallel, the parties have been diligently meeting and conferring to narrow and resolve
5 issues related to the proper scope of document discovery.

6 5. In response to a stipulated motion on October 25, 2021, on October 29, 2021, the Court
7 extended the end of damages discovery for approximately thirty days (given the Thanksgiving
8 holiday week) from November 2, 2021 until December 10, 2021.

9 6. Subsequent to that order, the parties have continued to diligently meet and confer to
10 narrow and resolve issues relating to damages discovery. Each party has made supplemental
11 document productions and responses to interrogatories following those meet and confers.

12 7. There remain a few disputes that the parties are attempting to resolve, but which may
13 result in supplemental productions.

14 8. In order to continue their efforts to resolve or narrow document discovery issues and to
15 accommodate witness schedules, including over the holiday period, they jointly propose damages
16 discovery be extended to January 28, 2022.

17 9. Such extension will also accommodate the health issues of one of the individuals who
18 is scheduled to be deposed.

19 10. This is the parties' second request to extend the damages discovery deadline and they
20 agree good cause exists. Extending the damages discovery deadline will not prejudice either party
21 and will not impact any other deadline in this matter.

22 DATED: December 3, 2021.

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24
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CONSENTED MOTION TO EXTEND DAMAGES
DISCOVERY DEADLINE– 2
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1001 Fourth Avenue, Suite 3900
Seattle, Washington 98154-1051
Tel (206) 625-8600
Fax (206) 625-0900

CORR CRONIN, LLP

DAVIS WRIGHT TREMAINE LLP

s/ Eric A. Lindberg

Steven W. Fogg, WSBA No. 23528
Eric A. Lindberg, WSBA No. 43596
1001 Fourth Avenue, Suite 3900
Seattle, WA 98154-1051
(206) 625-8600 Phone
(206) 625-0900 Fax
Email: sfogg@corrchronin.com
elindberg@corrchronin.com

s/ Shima S. Roy

Warren J. Rheaume, WSBA No. 13627
Benjamin J. Byer, WSBA No. 38206
920 Fifth Avenue, Suite 330
Seattle, WA 98101-1610
(206) 622-3150 Phone
(206) 757-7700 Fax
Email: warrenrheaume@dwt.com
benbyer@dwt.com

Ronald Abramson (*Pro Hac Vice*)

David G. Liston (*Pro Hac Vice*)

Ari J. Jaffess (*Pro Hac Vice*)

M. Michael Lewis (*Pro Hac Vice*)

Alex G. Patchen (*Pro Hac Vice*)

LISTON ABRAMSON LLP

The Chrysler Building

405 Lexington Avenue

New York, NY 10174

(212) 822-0160 Phone

(917) 663-5528 Fax

Email: ron.abramson@listonabramson.com

david.liston@listonabramson.com

michael.lewis@listonabramson.com

ari.jaffess@listonabramson.com

alex.patchen@listonabramson.com

Attorneys for Plaintiff WAG Acquisition, LLC

Kevin M. O'Brien, (*Pro Hac Vice*)

Richard V. Wells, (*Pro Hac Vice*)

Christine M. Streatfield, (*Pro Hac Vice*)

Shima S. Roy, (*Pro Hac Vice*)

BAKER & McKENZIE LLP

815 Connecticut Avenue, N.W.

Washington, DC 20006

Email: kevin.o'brien@bakermckenzie.com

richard.wells@bakermckenzie.com

christine.streatfield@bakermckenzie.com

shima.roy@bakermckenzie.com

James S. Blank, (*Pro Hac Vice*)

BAKER & McKENZIE LLP

452 Fifth Avenue

New York, NY 10018

Email: james.blank@bakermckenzie.com

*Attorneys for Defendants Flying Crocodile Inc.,
dba FCI Inc.; FCI, Inc., fka Flying Crocodile Inc.;
Accretive Technology Group Inc. dba Accretive
Networks; ICF Technology Inc., Riser Apps LLC;
Streamates Limited; dba Streamates Limited LLC*

CONSENTED MOTION TO EXTEND DAMAGES
DISCOVERY DEADLINE- 3
(Case No. 2:19-cv-01278-BJR)

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CERTIFICATE OF SERVICE

I certify that on December 3, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties of record.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED at Seattle, Washington on December 3, 2021.

s/ Monica Dawson
Monica Dawson

CONSENTED MOTION TO EXTEND DAMAGES
DISCOVERY DEADLINE– 4
(Case No. 2:19-cv-01278-BJR)

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1001 Fourth Avenue, Suite 3900
Seattle, Washington 98154-1051
Tel (206) 625-8600
Fax (206) 625-0900